UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

* * * * * * * * * * * * * * * * * *

UNITED STATES OF AMERICA

v. * CRIMINAL NO. 04-CR-30046-MAP

MICHAEL BERGDOLL *

* **********

<u>DEFENDANT'S MOTION TO EXTEND TIME WITHIN</u> <u>WHICH TO PAY RESTITUTION</u>

Now comes the defendant in the above captioned matter and requests this

Honorable Court to grant him a one year extension of the time period within which he
must make restitution.

In support of this request, the defendant states as follows:

- He is currently confined to the Bureau of Prisons pursuant to the sentence imposed by this court;
- At his sentencing this court ordered that restitution be paid in full by January 17,
 2008;
- 3. Upon information and belief, while in custody, the defendant has attempted to make payments towards the amount owed for restitution;
- 4. Upon information and belief, the defendant's only significant assets are two parcels of real property;
- 5. Upon information and belief, both of these properties have been on the market for some time, however neither has sold despite the price having been lowered on more than one occasion.

The defendant is desirous of paying his restitution in full, however he will need additional time to comply with the court's order.

THE DEFENDANT

By: /s/ David P. Hoose DAVID P. HOOSE, BBO#239400 SASSON, TURNBULL & HOOSE 1145 Main Street, Suite 304 Springfield, MA 01103 (413) 732-1939 (413) 746-5767 [fax]